DENNER • O'MALLEY, LLP COUNSELLORS AT LAW

FOUR LONGFELLOW PLACE, 35TH FLOOR, BOSTON, MA 02114 TELEPHONE: (617) 227-2800 TELEFAX: (617) 973-1562

October 3, 2005

Courtroom Clerk Rex Brown
The Honorable Judge Joyce London Alexander
United States Magistrate Judge
U.S. District Court for District of Massachusetts
John Joseph Moakley U.S. Courthouse
One Courthouse Way
Boston, Massachusetts 02210

Re: USA v. Hana F. Al Jader
Docket No. 05-CR10085-RCL

Dear Mr. Brown:

Enclosed please find Assented-To Motion to Continue Date for Filing Motions to Suppress and Date for Final Status Conference that also was electronically filed this date.

Kindly docket and file this document in the usual manner.

Thank you for your cooperation.

Very truly yours,

Laura P. Malouf

Enclosure

Copy: Assistant United States Attorney S. Theodore Merritt
Office of the United States Attorney for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
One Courthouse Way, Suite 9200
Boston, Massachusetts 02110

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CR. NO. 05-10085-RCL

HANA F. AL JADER

ASSENTED-TO MOTION TO CONTINUE DATE FOR FILING MOTIONS TO SUPPRESS AND DATE FOR FINAL STATUS CONFERENCE

Hana F. Al Jader ("the defendant"), by and through undersigned counsel, hereby submits this assented-to motion to continue by 14 days the date for filing motions to suppress from October 28, 2005 to November 11, 2005, and the date for final status conference from October 31, 2005 to November 14, 2005.

As the basis for this motion, the defendant notes that although she and her counsel are diligently reviewing the discovery materials provided to them by the Government and investigating various matters concerning the instant action, the intervening religious Fast of Ramadan, necessarily will greatly constrain their efforts. As reason therefore, the defendant states that she and many of the individuals with knowledge concerning this case are Muslim and observe the Fast of Ramadan ("Ramadan"). Ramadan begins on October 5, 2005 and ends on November 4, 2005. During the entire time of Ramadan, strict restraints are placed on the daily lives of Muslims. They are not allowed to eat or drink during the daylight hours. They are to engage in hours of prayer and concentrate on their faith rather than the concerns of their everyday lives.

In order to respect her religious observances, counsel will be asked to retrain from discussing with the defendant her case, specific defense strategies, motion filings, and

other case-related matters during Ramadan. As such, the defendant will not be able to participate in, review, and/or provide approval for, the scheduled filing of evidentiary motions for the next 30 days.

By extending the defendant the requested extensions of time, the Court will allow the defendant and her counsel adequate time to prepare motions to suppress (and the Government adequate time to prepare its oppositions) prior to the final status conference. At the same time, by allowing this motion, the Court will allow the defendant to engage in her required religious observances without interruption and distraction.

WHEREFORE, the defendant asks this Court to grant the motion by (1) continuing the date from October 28, 2005 to November 11, 2005 for filing motions to suppress, (2) providing the Government 30 days thereafter to respond; and (3) continuing the date for the final status conference from October 31, 2005 to November 14, 2005.

The government assents to this motion. 1

Respectfully submitted, HANA F. AL JADER, By her attorneys

Jeffrey A. Denner, BBO No. 120520 Brad Bailey, BBO No. 549749 Gary G. Pelletier, BBO No. 631732 Laura P. Malouf, BBO No. 637049 DENNER O'MALLEY, LLP Four Longfellow Place, 35th Floor Boston, Massachusetts 02114 617-227-2800

Page 3 of 3

Dated: October 3, 2005.

¹ The government predicates its assent to this motion upon a reasonable extension of its time to respond to the defendant's motions to suppress. Accordingly, the defendant asks the Court to extend the government's time to respond to her motions to suppress for the reasons outlined in the body of this motion.